

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

**NOTICE OF APPEARANCE AND REQUEST  
FOR DOCUMENTS UNDER 11 U.S.C. §§ 901, 1109(b)  
AND FED. R. BANKR. P. 2002, 3017(a), 9007, 9010**

**PLEASE TAKE NOTICE** that the undersigned hereby files an appearance as counsel to The Kresge Foundation (“Kresge”) and, pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017(a), 9007, 9010, and section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), made applicable in chapter 9 cases by section 901 of the Bankruptcy Code, requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statement(s) and plan(s) or reorganization, or other documents, filed or entered in this case, be transmitted to the following:

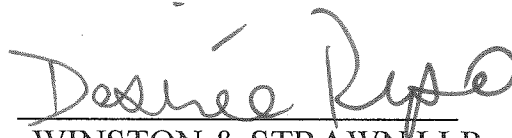
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**PLEASE TAKE FURTHER NOTICE** that under sections 901 and 1109(b) of the Bankruptcy Code, this request includes not only the notices and papers to which the Federal Rules of Bankruptcy Procedure refer, but also, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise that (1) affects or seeks to affect in any way any rights or interest of any creditor or party in interest in this case, including Kresge, with respect to: (a) the City of Detroit, Michigan (the “Debtor”); (b) property of the Debtor or proceeds thereof in which the Debtor may claim an interest; or (c) property of the Debtor or proceeds thereof in the possession, custody, or control of others that the Debtor may seek to use; or (2) that requires or seeks to require any act, delivery of any property, payment or other conduct by Kresge.

**PLEASE TAKE FURTHER NOTICE** that neither this notice nor any later appearance, pleading, claim, or suit shall waive (1) Kresge's rights to have final orders in non-core matters entered only after *de novo* review by a United States District Court; (2) Kresge's rights to a trial by jury in any proceeding so triable in this case or any case; (3) Kresge's rights to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which Kresge is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Kresge expressly reserves.

Dated: June 12, 2014



WINSTON & STRAWN LLP

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